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*d/b/a The Cosmopolitan of Las Vegas*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

MOHAMED ELAKHDAR,

Plaintiff,

v.

NEVADA PROPERTY 1 LLC d/b/a THE  
COSMOPOLITAN OF LAS VEGAS,

Defendant.

Case No. 2:22-cv-00181-RFB-NJK

**STIPULATION AND [PROPOSED] ORDER  
TO CONTINUE TRIAL DATE**

**(First Request)**

Defendant Nevada Property 1 LLC d/b/a The Cosmopolitan of Las Vegas (“Defendant”) and Plaintiff Mohamed Elakhdar (“Plaintiff”), by and through their respective counsel of record, hereby submit this Stipulation and [Proposed] Order to Continue Trial Date. This Stipulation is made and based upon Local Rules IA 6-1 and LR 26-3.

The parties respectfully seek a ninety (90) day extension to continue the trial date and remaining deadlines in the current Order Regarding Trial [ECF No. 18] to accommodate currently scheduled trial conflicts and potential resolution of this case through settlement conference or mediation.

**A. Current Trial Schedule:**

- |  |                   |
|--|-------------------|
| 1. Trial Date:                         | February 12, 2024 |
| 2. Calendar Call:                      | February 6, 2024  |
| 3. Stipulation to Continue Trial Date: | January 17, 2024  |
| 4. Motions in Limine:                  | January 12, 2024  |

**B. Proposed Schedule:**

The parties propose the following schedule:

- |    |                                     |                |
|----|-------------------------------------|----------------|
| 1. | Trial Date:                         | May 13, 2024   |
| 2. | Calendar Call:                      | May 6, 2024    |
| 3. | Stipulation to Continue Trial Date: | April 16, 2024 |
| 4. | Motions in Limine:                  | April 13, 2024 |

**C. Reasons for the Requested Extension and Statement of Good Cause:**

The parties respectfully submit that this request for extension is supported by good cause, as there are existing, current trial conflicts. Additionally, the parties are exploring potential settlement and resolution of this case. The requested extension will allow the parties to continue their efforts to reach a resolution without incurring discovery and expert related fees and costs.

**SO STIPULATED:**

Dated this \_6th\_ day of November, 2023.

Dated this \_6th\_ day of November, 2023.

THE VERSTANDIG LAW FIRM, LLC

WILSON ELSEER MOSKOWITZ  
EDELMAN & DICKER LLP

/s/ Maurice VerStandig

/s/ Karen Bashor

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Case No. 2:22-cv-00181-RFB-NJK

**[PROPOSED] ORDER TO CONTINUE  
TRIAL DATE**

**(First Request)**

**GOOD CAUSE SHOWN, IT IS HEREBY ORDERED** that the trial order is modified as follows:

- |    |                                     |                             |
|----|-------------------------------------|-----------------------------|
| 1. | Trial Date:                         | May 20, 2024, Stacked #3    |
| 2. | Calendar Call:                      | April 22, 2024 at 1:00 p.m. |
| 3. | Stipulation to Continue Trial Date: | April 16, 2024              |
| 4. | Motions in Limine:                  | April 13, 2024              |

The Statement of the Case, Witness Lists, Suggested Voir Dire, Exhibit Lists and Jury Instructions are all due 4/12/2024. Exhibits are due at calendar call as outlined in the JERS attachment to the previous Order Regarding Trial.

Dated this 6th Day of November, 2023.



UNITED STATES DISTRICT JUDGE